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February 26, 2010

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## **Via Electronic Comment Filing System**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Suite TW-A325  
Washington, DC 20554

**Re: Pine Belt Telephone Company, Inc.'s Annual 47 C.F.R. § 64.2009(e) Customer  
Proprietary Network Information (CPNI) Compliance Certification  
EB Docket No. 06-36**

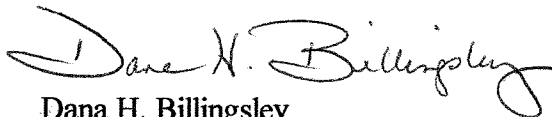
Dear Ms. Dortch:

On behalf of Pine Belt Telephone Company, Inc. (hereinafter, "Pine Belt Telephone"), please find attached the annual CPNI Compliance Certification ("Certification") for Pine Belt Telephone for the year 2009 in EB Docket No. 06-36, which has been filed electronically via the Federal Communication Commission's ("Commission") Electronic Comment Filing System on this date. Simultaneously, Pine Belt Telephone has also provided one (1) copy of the Certification to Best Copy and Printing, Inc., via electronic mail at [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM), as required under the Commission's Public Notice, DA 10-91 (released January 15, 2010).

Please contact me if you have any questions regarding this matter.

Very truly yours,

WILKERSON & BRYAN, P.C.



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Enclosure

cc: John Nettles  
Best Copy and Printing, Inc.

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2009

Date filed: February 18, 2010

Name of company covered by this certification: Pine Belt Telephone Company, Inc.

Form 499 Filer ID: 801888

Name of signatory: John Nettles

Title of signatory: President

In response to the Federal Communications Commission's ("Commission") Public Notice, DA 10-91 (released January 15, 2010), Pine Belt Telephone Company, Inc. states as follows:

I, John Nettles, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's Customer Proprietary Network Information ("CPNI") rules, as set forth in 47 C.F.R. § 64.2001, *et seq.*

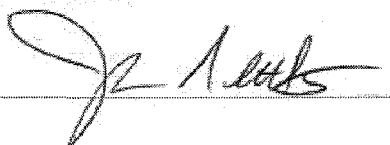
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001, *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI, including unauthorized access to or disclosure of CPNI.

The company represents and warrants that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed



# *Pine Belt Telephone Company, Inc.*

3984 County Rd. 32 - P.O. Box 279  
Arlington, Alabama 36722  
Phone (334) 385-2106

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

## **ANNUAL 47 C.F.R. § 64.2009(e) CPNI COMPLIANCE STATEMENT OF PINE BELT TELEPHONE COMPANY, INC.**

**EB Docket No. 06-36**

In compliance with the annual certification required under 47 C.F.R. § 64.2009(e), the undersigned officer of Pine Belt Telephone Company, Inc. (hereinafter, "Pine Belt") files the following statement of compliance with the requirements set forth in 47 C.F.R. § 64.2001, *et seq.* on behalf of Pine Belt:

1. I have personal knowledge that Pine Belt has implemented a system by which the status of a customer's Customer Proprietary Network Information ("CPNI") approval can be clearly established prior to the use of CPNI.
2. I have personal knowledge that Pine Belt obtains written approval for the use of its customers' CPNI and that Pine Belt has notified its customers of their right to restrict Pine Belt's use of, disclosure of and access to their CPNI prior to obtaining such written approval.
3. I have personal knowledge that Pine Belt has trained its personnel who may use, disclose or have access to CPNI as to when such personnel are and are not authorized to use CPNI in accordance with the requirements of 47 C.F.R. § 64.2001, *et seq.* and that Pine Belt has an express disciplinary process in place to deal with breaches of CPNI.
4. I have personal knowledge that Pine Belt implemented procedures to safeguard the disclosure of its customers' CPNI, including a customer password and backup authentication system, notification of customer account changes and notification of security breaches of customer CPNI to law enforcement agencies.
5. I have personal knowledge that Pine Belt maintains records of its own and its affiliates' sales and marketing campaigns that use customer CPNI and further maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to customer CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and

services were offered as part of the campaign. Pine Belt retains all such records for a minimum period of one (1) year.

6. I have personal knowledge that Pine Belt has established a supervisory review process regarding Pine Belt's compliance with outbound marketing situations and that Pine Belt maintains records of such compliance for a minimum period of one (1) year. Pine Belt's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.

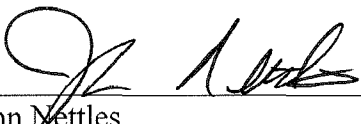
7. I have personal knowledge that Pine Belt has not received any information with regard to the processes pretexters are using to attempt to access CPNI.

On behalf of Pine Belt, I represent and warrant that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission, and acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject Pine Belt to enforcement action.

Executed on this 18<sup>th</sup> day of February, 2010.

PINE BELT TELEPHONE COMPANY, INC.

By:

  
\_\_\_\_\_  
John Nettles  
President